

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

PAMELA G. CAPPETTA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:08-cv-00288
)	
GC SERVICES LIMITED PARTNERSHIP,)	
)	
Defendant.)	

**MEMORANDUM IN SUPPORT OF DEFENDANT'S
MOTION TO FILE EXHIBITS UNDER SEAL**

COMES NOW Defendant GC Services Limited Partnership ("GC Services"), by counsel, and in support of its Motion to File Exhibits Under Seal states as follows:

1. Exhibit E to Defendant's Memorandum in Opposition to Plaintiff's Renewed Motion for Leave to Amend references and/or includes proprietary information belonging to a third party which has been previously designated as "Confidential" pursuant to the Stipulated Protective Order entered in this case.

2. Exhibit F to Defendant's Memorandum in Opposition to Plaintiff's Renewed Motion for Leave to Amend references and/or includes proprietary information belonging to a third party which has been previously designated as "Confidential" pursuant to the Stipulated Protective Order entered in this case.

3. Exhibit G to Defendant's Memorandum in Opposition to Plaintiff's Renewed Motion for Leave to Amend references and/or includes proprietary information belonging to a third party which has been previously designated as "Confidential" pursuant to the Stipulated Protective Order entered in this case. In addition, Exhibit G contains personal identifiers as

defined in L.R. 7(C)(1)(a) through (e), including items such as a third party's financial account number and home address(es).

4. No other procedure will suffice to protect this confidential and protected information contained in the exhibits upon filing. Accordingly, Defendant seeks to file these exhibits to its Memorandum in Opposition to Plaintiff's Renewed Motion for Leave to Amend under seal with the Court.

WHEREFORE, Defendant GC Services Limited Partnership respectfully requests that this Court direct the Clerk of Court to file under seal Exhibits E, F and G to Defendant's Memorandum in Opposition to Plaintiff's Renewed Motion for Leave to Amend.

Respectfully submitted,

G.C. SERVICES LIMITED PARTNERSHIP

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May, 2009, I electronically filed the foregoing Memorandum in Support of Motion to File Exhibits Under Seal with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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